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17 **UNITED STATES DISTRICT COURT**  
18 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

19 PATRICIA RODGERS, JEFF  
20 RODGERS, IZAAR VALDEZ,  
21 and JENNIFER RIBALTA,  
22 Plaintiffs,  
23  
24 **CASE NO. 2:18-cv-07480-JAK (MRWx)**  
25 **[Related Case 2:13-cv-02488-BRO-RZ]**  
26 **APPLICATION FOR LEAVE TO FILE**  
27 **UNDER SEAL**

28 vs.  
29  
30 HERBALIFE INTERNATIONAL  
31 OF AMERICA, INC.,  
32 Defendant.  
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**APPLICATION TO FILE UNDER SEAL**

Pursuant to Local Rule 79-5, Plaintiffs PATRICIA RODGERS, JEFF RODGERS, IZAAR VALDEZ, and JENNIFER RIBALTA ("Plaintiffs") hereby applies for leave of Court to file Exhibits 4 and 20 to the Amended Complaint [ECF No. 202] under seal. Exhibit 4 are PowerPoint presentations used in "Nutrition Club trainings" for all distributors (third-party, non-Herbalife employees). Exhibit 20 is draft PowerPoint presentation for use at the 2015 Future President's Team Retreat with comments from Herbalife corporate. Plaintiffs do not believe the documents are Confidential in any respect.

Counsel for the parties in this matter were informed of Plaintiffs' intent to seek leave to file Exhibits 4 and 20 under seal. See Declaration of Etan Mark In Support of Application for Leave to File Under Seal, filed concurrently herewith. Specifically, counsel for Defendant HERBALIFE INTERNATIONAL OF AMERICA ("HERBALIFE") has asked that Plaintiffs file Exhibits 4 and 20 under seal.

Plaintiffs respectfully request that the Court grant the Application to File Under Seal Exhibits 4 and 20 to the Amended Complaint.

Executed this 27th day of November, 2019 at Los Angeles, California.

Respectfully submitted,

Mark Migdal Hayden

By s Etan Mark

Etan Mark, Esq.

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